## COMMONWEALTH OF MASSACHUSETTSOFFICE

SINESS LITIGATION SESSION
ISTRICT COURT HELE OF MASS
UPERIOR COURT IVIL ACTION O 05-0269 BLS dge van Gestel

## STIPULATION TO EXTEND DEFENDANTS' TIME TO RESPOND AND TO PROPOSE BRIEFING SCHEDULE

WHEREAS, on or about January 30, 2005, plaintiffs Commonwealth Care Alliance, Health Care for All, Glen Crenshaw, and Paula Crenshaw (the "Plaintiffs") filed a Class Action Complaint and Jury Demand (the "Initial Complaint") against AstraZeneca Pharmaceuticals LP, Zeneca Holdings, Inc. ("Defendants") and certain other defendants (the "Original Defendants");

WHEREAS the Plaintiffs and the Original Defendants had previously agreed that Original Defendants would have to and including May 6, 2005 to answer or otherwise respond to the Initial Complaint;

WHEREAS, the Plaintiffs subsequently filed their First Amended Class Action Complaint on April 11, 2005;

NOW, therefore, the parties, by and through their undersigned counsel, pursuant to Mass. R. Civ. P. 6(b), hereby stipulate and agree as follows:

The Defendants' time to answer or otherwise respond to the First Amended Complaint is hereby extended to and including May 27, 2005. In the event that the Defendants file any motion in response to the First Amended Complaint, the briefing schedule for such motion shall be as follows:

- Defendants shall file such motion on or before May 27, 2005;
- Plaintiffs shall have until and including June 29, 2005 to file an opposition to Defendants' motion; and
- Defendants shall have until and including July 15, 2005 to file a reply to Plaintiffs' opposition to the motion.

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Respectfully submitted,

COMMONWEALTH CARE ALLIANCE, HEALTH CARE FOR ALL, GLENN CRENSHAW, PAULA CRENSHAW

By their attorneys,

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Dated: April 26, 2005

ASTRAZENECA PHARMACEUTICALS LP, ZENECA HOLDINGS, INC.

By their attorneys,

Peter L. Welsh (BBO #643261) Joshua S. Levy (BBO #563017) Harvey J. Wolkoff (BBO #532880)

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So ordered,

Hon. Allan van Gestel, Presiding Justice Business Litigation Session

## CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on April 26, 2005 I caused a true copy of the above document to be served by mail upon counsel for Plaintiffs at the following addresses:

Thomas M. Sobol One Main Street, 4<sup>th</sup> Floor Cambridge, MA 02142

and

Steve W. Berman 1301 Fifth Avenue, Suite 2900 Seattle, WA 98101.

eter L. Welsh

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